

EXHIBIT B

<i>Picard v. Shapiro Second Amended Complaint</i>	<i>Picard v. Multi-Strategy Fund Amended Complaint</i>
108. Of the Initial Transfers, BLMIS made payments to or for the benefit of the Initial Transferee Defendants of at least \$41,066,486 during the six years prior to the Filing Date (the “Six Year Transfers”). . . . The Six Year Transfers are listed in Column 10 of the schedules attached as Exhibit B.	119. Of the Judgment Amount, \$2,895,000,000 was transferred to Fairfield Sentry during the six years preceding the Filing Date (the “Fairfield Sentry Six Year Transfers”). . . .
110. Based on the Trustee’s investigation to date, the Initial Transferee Defendants subsequently transferred a portion of the \$53,778,486 received from BLMIS (the “Subsequent Transfers”) to [various defendants] (collectively, the “Subsequent Transferee Defendants”).	120. Prior to the Filing Date, Fairfield Sentry subsequently transferred a portion of the Fairfield Sentry Initial Transfers to Defendant (the “Fairfield Sentry Subsequent Transfer”). Based on the Trustee’s investigation to date, the Fairfield Sentry Subsequent Transfer totaled \$25,763,374. A chart setting forth the presently known Fairfield Sentry Subsequent Transfer is attached as Exhibit C.
<p>162. The Subsequent Transfers were transferred by the Initial Transferee Defendants to the Subsequent Transferee Defendants.</p> <p>163. Each of the Subsequent Transfers was made directly or indirectly to one or more of the Subsequent Transferee Defendants.</p> <p>164. The Subsequent Transferee Defendants are immediate or mediate transferees from the Initial Transferee Defendants.</p> <p>165. The Subsequent Transferee Defendants received the Subsequent Transfers with knowledge of and/or willfully blind to BLMIS’s fraudulent scheme.</p> <p>166. As a result of the foregoing, and pursuant to N.Y. Debt. & Cred. §§ 278 and/or 279, § 550(a) of the Bankruptcy Code, and 15 U.S.C. § 78fff-2(c)(3), the Trustee is entitled to a judgment against Subsequent Transferee Defendants: . . . recovering the Subsequent Transfers, or the value thereof, from the Subsequent Transferee Defendants for the benefit of the BLMIS estate</p>	<p>126. The Fairfield Sentry Subsequent Transfer is recoverable from Defendant under 11 U.S.C. § 550(a) and 15 U.S.C. § 78fff-2(c)(3).</p> <p>127. Defendant is an immediate or mediate transferee of the Fairfield Sentry Subsequent Transfer from Fairfield Sentry.</p> <p>128. As a result of the foregoing, pursuant to 11 U.S.C. §§ 105(a) and 550(a), and 15 U.S.C. § 78fff-2(c)(3), the Trustee is entitled to a judgment against Defendant: . . . recovering the Fairfield Sentry Subsequent Transfer, or the value thereof, from Defendant for the benefit of the estate of BLMIS</p>